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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC.'S AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBITS TO THEIR  
MOTION TO COMPEL WAYMO TO  
SUPPLEMENT RFA &  
INTERROGATORY RESPONSES AND  
TO PRODUCE UNREDACTED  
DOCUMENT**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Uber Technologies, Inc. and  
7 Ottomotto LLC's Administrative Motion to File Under Seal Exhibits to Their Motion to Compel  
8 Waymo to Supplement RFA & Interrogatory Responses and to Produce Unredacted Document (the  
9 "Administrative Motion"). The Administrative Motion seeks an order sealing highlighted portions of  
10 Uber's Letter Brief to Compel RFA & Interrogatory Responses ("Uber's Motion") and the entirety of  
11 Exhibits 1-3 and 5-8 to the Pritt Declaration.

12 3. The portions of Uber's Motion highlighted in green, the entirety of Exhibits 1-2 and 5,  
13 and the portions of Exhibits 3 and 6-8 highlighted in green contain or refer to confidential business  
14 information, which Waymo seeks to seal.

15 4. Uber's Motion (green highlighted portions), Exhibit 2 (entire document), and Exhibits  
16 3, 6, and 8 (portions highlighted in green in version filed herewith), contain, reference, and/or describe  
17 Waymo's highly confidential and sensitive business information. The information Waymo seeks to  
18 seal regards confidential internal investigations. I understand that this confidential business  
19 information is maintained by Waymo as secret. The public disclosure of this information would give  
20 Waymo's competitors access to Waymo's strategy for and steps taken when conducting internal  
21 investigations. If such information were made public, I understand that Waymo's competitive  
22 standing would be significantly harmed. Uber's Motion (green highlighted portions) additionally  
23 contains an internal email alias composed of numerous Google employees, the disclosure of which  
24 would cause Waymo, Google, and those employees substantial harm due to the high public profile of  
25 this litigation. Exhibit 3 further includes confidential analysis of Waymo's business and competition,  
26 including licensing and financial details, and Exhibit 8 further contains confidential hyperlinks and  
27 employee headcount numbers. I understand that this confidential business information is maintained  
28 by Waymo as secret. The public disclosure of this information would give Waymo's competitors

1 access to in-depth insight into—and analysis of—Waymo’s business strategy for its autonomous  
2 vehicle system.

3         5.       Exhibit 1 (entire document) contains, references, and/or describes and Waymo’s  
4 asserted trade secrets and Waymo’s highly confidential and sensitive business information. The  
5 information Waymo seeks to seal includes the confidential design and functionality of Waymo’s  
6 proprietary autonomous vehicle system, including its LiDAR designs, which Waymo maintains as  
7 secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that  
8 the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of this  
9 information would give Waymo’s competitors access to descriptions of the functionality or features of  
10 Waymo’s autonomous vehicle system. If such information were made public, I understand that  
11 Waymo’s competitive standing would be significantly harmed. The information Waymo seeks to seal  
12 also includes confidential analysis of Waymo’s business and competition, including financial details  
13 and employee compensation details. I understand that this confidential business information is  
14 maintained by Waymo as secret. The public disclosure of this information would give Waymo’s  
15 competitors access to in-depth insight into—and analysis of—Waymo’s business strategy for its  
16 autonomous vehicle system.

17         6.       Exhibit 5 (entire document) contains, references, and/or describes Waymo’s highly  
18 confidential and sensitive business information. The information Waymo seeks to seal regards  
19 confidential business strategy, including mergers and acquisitions-related details. I understand that  
20 this confidential business information is maintained by Waymo as secret. The public disclosure of  
21 this information would give Waymo’s competitors access to Waymo’s strategy for and steps taken  
22 when conducting internal investigations. If such information were made public, I understand that  
23 Waymo’s competitive standing would be significantly harmed. The public disclosure of this  
24 information would give Waymo’s competitors access to in-depth insight into—and analysis of—  
25 Waymo’s business strategy for its autonomous vehicle system.

26         7.       Exhibit 7 (green highlighted portions) contains Waymo or Google employee emails and  
27 phone numbers and an internal email alias composed of numerous Google employees, the disclosure  
28

1 of which would cause Waymo, Google, and those employees substantial harm due to the high public  
2 profile of this litigation.

3 8. Waymo's request to seal is narrowly tailored to those portions of Uber's Motion and  
4 Exhibits 1-3 and 5-8 that merit sealing.

5  
6 I declare under penalty of perjury under the laws of the State of California and the United  
7 States of America that the foregoing is true and correct, and that this declaration was executed in San  
8 Francisco, California, on September 5, 2017.

9 By /s/ Felipe Corredor

10 Felipe Corredor

11 Attorneys for WAYMO LLC

12  
13 **ATTESTATION**

14 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
15 document has been obtained from Felipe Corredor.

16  
17 By: /s/ Charles K. Verhoeven

18 Charles K. Verhoeven